

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE
CORPORATION, *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 22-10584 (CTG)
)

) (Jointly Administered)
)

**NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED FOR HEARING ON
SEPTEMBER 28, 2022 AT 10:00 A.M. (PREVAILING EASTERN TIME)
BEFORE THE HONORABLE CRAIG T. GOLDBLATT**

The hearing will be held in-person in Judge Goldblatt's courtroom. All parties, including witnesses, are expected to attend in person unless permitted to appear via Zoom. Appearances at in-person court proceedings using Zoom are allowed only in the following circumstances: (i) a party who files a responsive pleading intends to make only a limited argument; (ii) a party who has not submitted a pleading but is interested in observing the hearing; (iii) a party who has a good faith health-related reason and has obtained permission from Judge Goldblatt's chambers to appear remotely, or (iv) other extenuating circumstances as determined by Judge Goldblatt. If you intend to appear via Zoom, you are required to register in advance. The Court is asking all parties appearing via Zoom to register no later than September 27, 2022 at 4:00 p.m.

COURTCALL WILL NOT BE USED FOR THIS HEARING.

Please use the following link to register for this hearing

<https://debuscourts.zoomgov.com/meeting/register/vJltce6srT0vGkOPDA9vCCHAjoai7TorMy8>

After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors' mailing address is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

² **Amended items are indicated in bold.**

MATTERS GOING FORWARD:

1. Motion of the Debtors for Entry of Orders: (I)(A) Approving Bidding Procedures for One or More Sales or the Sale of Substantially All of the Debtors' Assets, (B) Authorizing the Debtors to Enter Into One or More Stalking Horse Agreements and to Provide Bid Protections Thereunder, (C) Scheduling an Auction and Approving the Form and Manner of Notice Thereof, (D) Approving Assumption and Assignment Procedures and (E) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof; (II) (A) Approving the Sale or Sales of the Debtors' Assets Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief (Filed September 7, 2022) [Docket No. [406](#)].

Response Deadline: September 26, 2022 at 4:00 p.m. (Prevailing Eastern Time).

Responses Received:

- A. Objection of Cigna to Motion of the Debtors for Entry of Orders: (I)(A) Approving Bidding Procedures for One or More Sales or the Sale of Substantially All of the Debtors Assets, (B) Authorizing the Debtors to Enter into One or More Stalking Horse Agreements and to Provide Bid Protections Thereunder, (C) Scheduling an Auction and Approving the Form and Manner of Notice Thereof, (D) Approving Assumption and Assignment Procedures and (E) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof; (II)(A) Approving the Sale or Sales of the Debtors Assets Free and Clear of Liens, Claims, Interests and Encumbrances (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief (Filed September 21, 2022) [Docket No. [463](#)].

Related Documents

- A. Order Shortening the Notice Periods with Respect to the Debtors' Motion to Establish Bidding and Sale Procedures (Signed September 9, 2022) [Docket No. [415](#)].
- B. Notice of Hearing on Motion of the Debtors for Entry of Orders: (I)(A) Approving Bidding Procedures for One or More Sales or the Sale of Substantially All of the Debtors' Assets, (B) Authorizing the Debtors to Enter Into One or More Stalking Horse Agreements and to Provide Bid Protections Thereunder, (C) Scheduling an Auction and Approving the Form and Manner of Notice Thereof, (D) Approving Assumption and Assignment Procedures and (E) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof; (II) (A) Approving the Sale or Sales of the Debtors' Assets Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Approving the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (III) Granting Related Relief (Filed September 9, 2022) [Docket No. [422](#)].

Status: This matter is going forward.

2. Debtors' Motion for Entry of an Order (I) Granting Interim Approval of the Adequacy of Disclosures in the Combined Disclosure Statement and Plan; (II) Scheduling a Combined Confirmation Hearing and Setting Deadlines Related Thereto; (III) Approving Solicitation Packages and Procedures; (IV) Approving the Forms of Ballots; and (V) Granting Related Relief (Filed September 7, 2022) [Docket No. [407](#)].

Response Deadline: September 26, 2022 at 4:00 p.m. (Prevailing Eastern Time) (Extended to September 27, 2022 at 12:00 noon for Seneca Mortgage Servicing LLC; Extended to September 27, 2022 at 4:00 p.m. for the Official Committee of Unsecured Creditors **and to September 27, 2022 at 9:00 p.m.** for WARN Plaintiffs).

Responses Received:

- A. **Objection of Seneca Mortgage Servicing LLC to the Combined Disclosure Statement and Chapter 11 Plan of First Guaranty Mortgage Corporation and Debtor Affiliate (Filed September 26, 2022) [Docket No. [475](#)].**
- B. **Objection of the United States Trustee to Conditional Approval of Debtors' Combined Chapter 11 Plan and Disclosure Statement (Filed September 26, 2022) [Docket No. [477](#)].**

Related Documents

- A. Order Shortening the Notice Periods with Respect to Debtors' Motion for Interim Approval of the Adequacy of Disclosures in the Combined Disclosure Statement and Plan, Scheduling a Combined Confirmation Hearing, and Approving Solicitation Procedures (Signed September 9, 2022) [Docket No. [416](#)].
- B. Notice of Hearing on Debtors' Motion for Entry of an Order (I) Granting Interim Approval of the Adequacy of Disclosures in the Combined Disclosure Statement and Plan; (II) Scheduling a Combined Confirmation Hearing and Setting Deadlines Related Thereto; (III) Approving Solicitation Packages and Procedures; (IV) Approving the Forms of Ballots; and (V) Granting Related Relief (Filed September 9, 2022) [Docket No. [424](#)].

Status: This matter is going forward

3. Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Strategic Mortgage Finance Group, LLC as Investment Banker to the Debtors (Filed September 12, 2022) [Docket No. [431](#)].

Response Deadline: September 26, 2022 at 4:00 p.m. (Prevailing Eastern Time).

Responses Received:

- A. Informal comments from the Office of the United States Trustee

Related Documents

- A. Order Shortening the Notice Periods with respect to Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Strategic Mortgage Finance Group, LLC as Investment Banker to the Debtors (Signed September 13, 2022) [Docket No. [437](#)].
- B. Notice of Hearing on Debtors Application for Entry of an Order Authorizing the Retention and Employment of Strategic Mortgage Finance Group, LLC as Investment Banker to the Debtors (Filed September 13, 2022) [Docket No. [439](#)].

Status: This matter is going forward.

Dated: **September 27, 2022**

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Mary F. Caloway

Laura Davis Jones (DE Bar No. 2436)
Timothy P. Cairns (DE Bar No. 4228)
Mary F. Caloway (DE Bar No. 3059)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
tcairns@pszjlaw.com
mcalloway@pszjlaw.com

-and -

DENTONS US LLP

Samuel R. Maizel
Tania M. Moyron
601 S. Figueroa Street, #2500
Los Angeles, CA 90017
Telephone: (213) 623-9300
Email: samuel.maizel@dentons.com
tania.moyron@dentons.com

-and-

DENTONS US LLP

David F. Cook
1900 K Street, NW
Washington, DC 20006
Telephone: (202) 496-7500
Email: david.f.cook@dentons.com

Counsel for Debtors and Debtors in Possession